



July 24, 2019

Eugene Bromley
NPDES Permits Section (WTR-2-3)
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Public Comments on Proposed new draft NPDES Permit CAG 280000

Dear Mr. Bromley:

Beacon West Energy Group, LLC. (Beacon West) is pleased to be able to provide comments on the new Draft NPDES Permit CAG 280000. We offer the following comments for EPA's consideration, in anticipation that they can be incorporated into the new Final NPDES Permit:

1. Part I.A.2. is missing Platform Gail's lease block number (P-0205).
2. Part II C.4: Requires Work Plan submittal within 12 months to characterize well stimulation fluids discharged. Does this requirement include chemical and toxicity analyses on these fluids during the first year of the permit, or does the work plan simply outline what will be tested for, and estimate volumes of returns for the first year? Further, Beacon West proposes to not be required to test produced water prior to commingling, since it is already being monitored annually (per Part II B.2).
3. Part II C. 4: Well Stimulation fluids (as well treatment fluids) commingled with produced water require daily sampling for WET 3 species toxicity, plus any chemicals expected to be present in the stimulation fluids, for 7 days immediately following a stimulation job flow back. As EPA is aware, the hold time for toxicity samples is limited to 36 hours, and due to logistics and weather delays, it will be very difficult to obtain, ship, and have the toxicity lab prepare the 3 different test species for 7 straight days. We request that EPA considers the allowance to collect one or two samples instead during the *peak* flow back of the stimulation fluids return.
4. Part II C.4. also states: "Upon approval of a work plan (submitted individually or jointly) by Region 9, implementation of the work plan becomes a requirement of this permit. Interim progress reports shall be submitted with quarterly DMR reports subsequent to the approval of a work plan. A final work plan report shall be submitted within four years of the effective date of this permit". We request that EPA clarify what is required to be included in the "final work plan report".

5. Part II C.5: WCWFs not comingled with Produced water require 3 species toxicity testing every quarter. If discharged, dilution doesn't apply, therefore passing toxicity tests could be an issue. Beacon West requests EPA to allow operators to factor in a Plumes UM dilution at the 100m mixing zone, as this is allowed for produced water.
6. Fact Sheet Table 1 lists the new Water Quality Criteria for Benzo (a) Pyrene and Dibenzo (a,h) Anthracene as 0.00013 ug/l, which is more than 100 times less than the 2014 permit. Even with produced water dilution applied, proposed levels are 10 times less than the test method's detection limit (MDL). Beacon West encourages EPA to raise the level of the criteria for these two constituents to, at a minimum, match the MDL value for EPA Method 625, which is 2 ug/l.
7. Part II F.1: Pipeline preservation fluids were added to the permit. To provide needed clarity, we recommend including a definition for Pipeline preservation fluids in Section V (Definitions).
8. Table C-1 of Appendix C lists a limit for Platform Grace for chlorine in Non-Contact Cooling water. Platform Grace only has fire water so we believe this is an error and should be omitted from the table.
9. Part II D.1: The table footnotes "Visual observations are not required when a facility is unstaffed; however, to qualify for this waiver, the Permittee must ensure that industrial materials at the facility that could be a source of pollutants in deck drainage are not exposed to stormwater". Beacon West requests that EPA to consider revising this language to state "visual observations are not required when a facility is unstaffed if the Permittee ensures potential sources of pollution are not exposed to stormwater."

Beacon West would like to thank EPA for allowing us to work with you in finalizing the new NPDES Permit CAG 280000. If you have any questions regarding the above comments, please contact John Garnett at (805) 395-9676, or john.garnett@beacon-west.com.

Sincerely,



Keith Wenal
EVP - EHSR